

NOWALSKY, BRONSTON & GOTHARD

A Professional Limited Liability Company

Attorneys at Law

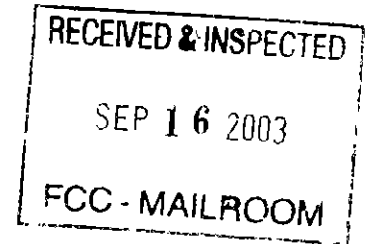
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August 22, 2003

Via Overnight Mail



Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
9300 East Hampton Drive
Capitol Heights, MD 20743

RE CC Dkt No 94-129 Certification of Exemption from "Drop-Off" Requirement

Dear Ms. Dortch:

American Phone Services Corp. ("APS"), by its undersigned counsel, hereby certifies that it qualifies for an exemption from the "drop-off" requirement set forth in 47 C.F.R. Section 64.1120.

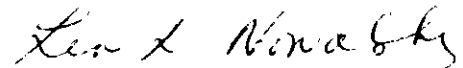
In its recent decision in CC Dkt. 94-129, the Commission established a new mechanism by which carriers' certifying as to their inability to comply with the "drop-off" rule will be exempt from that rule for a two-year period. See Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996, Policies and Rules Concerning Unauthorized Changes of Consumers' Long Distance Carriers, CC Docket No. 94-129, Third Order on Reconsideration and Second Notice of Proposed Rulemaking, 68 Fed. Reg. 19152 & 19176 (rel. March 17, 2003).

Due to technical limitations to the type of service available to APS's marketing companies through their local exchange carriers, APS's marketing representative are unable to "drop-off" a call after a three way conference call is initiated. This precludes APS from complying with the "drop-off" rule. A certification signed by Riccardo Ferranti, President of APS, is made in support of these statements under Section 1.16 of the Commission's rules is enclosed herewith.

Marlene H. Dortch
August 22, 2003
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Questions regarding this certification should be addressed to the undersigned. An additional copy of this letter has been enclosed to be date-stamped and returned in the envelope provided as evidence of the filing.

Sincerely,

A handwritten signature in cursive script, reading "Leon L. Nowalsky".

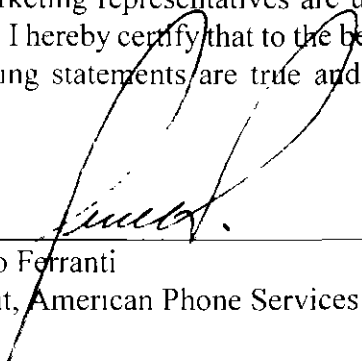
Leon L. Nowalsky
Counsel for American Phone Service
Corp

cc Nancy Stevenson, Federal Communications Commission
Qualex International

Enclosure

CERTIFICATION

I, Riccardo Ferranti, certify that I am President of American Phone Services Corp ("APS"), that I am authorized to make this certification for American Phone Services Corp. I certify that APS is unable to comply with the "drop-off" requirement as set forth in 47 C.F.R. Section 64.1120. Specifically, due to technical limitations to the type of service available to APS's marketing companies through their local exchange carriers, APS's marketing representatives are unable to "drop-off" a call after a three-way conference call is initiated. I hereby certify that to the best of my knowledge and belief, under penalty of perjury, the foregoing statements are true and correct. Executed on April 25, 2003



Riccardo Ferranti
President, American Phone Services Corp.